## Exhibit B

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From: Fischer, Brian J.

**Sent:** Tuesday, April 01, 2014 3:46 PM

To: 'Liebesman, Sidney S.'; Palella, Charles; Pachman, Steven; Brown, David M.

Cc: Bart, Andrew H.; Orpett, Natalie K.; Rachel Herrick Kassabian; Michael Carlinsky; Benjamin

Gildin

Subject: Schroeder

Attachments: 2014 04 01 Letter to Sidney Liebesman.pdf

Counsel – Please see the attached.

## Brian J. Fischer

Jenner & Block LLP
919 Third Avenue, New York, NY 10022-3908 | jenner.com
(212) 891-1629 | TEL
(212) 909-0815 | FAX
BFischer@jenner.com
Download V-Card | View Biography



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919 THIRD AVENUE NEW YORK NEW YORK 10022-3908

JENNER&BLOCK III

April 1, 2014

Andrew H. Bart Tel 212 891-1645 Fax 212 909-0805 abart@jenner.com

## VIA EMAIL AND OVERNIGHT DELIVERY

Sidney S. Liebesman, Esq. Montgomery McCracken 123 South Broad St. Philadelphia, PA 19109

Re:

Theodore F. Schroeder, et al. v. Pinterest, Inc., Brian S. Cohen, and

New York Angels, Inc. - Index No. 652183/2013

Dear Mr. Liebesman:

In your March 28, 2014 email, you accuse me and my partner, Brian Fischer, of committing "a clear violation of Rule 4.2 of the New York Rules of Professional Conduct" through our conversations with nonparty William Bocra. We strongly disagree that we have acted in any way contrary to the Rule. Rule 4.2 applies to communications "with a party the lawyer knows to be represented by another lawyer in the matter." To this date, we have no information that you represent Mr. Bocra. Certainly there is no statement in your email that you represent Mr. Bocra, let alone that you represented Mr. Bocra at the time of our conversations with him (which occurred in early 2013 and earlier this year). Indeed, based on your own complaint, Mr. Bocra has been disassociated from the company plaintiffs since at least mid-2008.

Of course, as we investigate your clients' claims and defend against them, we will continue to uphold our ethical obligations. To that end, please advise whether you represent Mr. Bocra, and if so, when that representation began. To be clear, we are not asking you whether you purport to represent the company plaintiffs. Finally, so that there is no risk of confusion going forward, we ask that you provide the same information with respect to non-party Brandon Stroy.

Sincerely.

Andrew H. Bart

AHB:cje

CC:

grow Hoat

Michael Carlinsky, Esq. (counsel for Pinterest)

Rachel Kassabian, Esq. (counsel for Pinterest)